

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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| In re: MICHAEL JOSEPH PIPITONE, | : | Chapter 13 |
| Debtor(s), | : | Case No. 5:24-bk-00079-MJC |
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| PENNYMAC LOAN SERVICES, LLC, | : | |
| Movant, | : | Motion for |
| v. | : | Relief from Stay |
| MICHAEL JOSEPH PIPITONE and | : | |
| JACK N. ZAHAROPOULOS, TRUSTEE, | : | |
| Respondent(s), | : | |

**ANSWER TO MOTION OF
PENNYMAC LOAN SERVICES FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **MICHAEL JOSEPH PIPITONE**, by and through their attorneys, J. ZAC CHRISTMAN, ESQUIRE, and in Answer to the Motion of **PENNYMAC LOAN SERVICES** for Relief from Stay aver(s):

- 1-2. Admitted.
3. Admitted in part and Denied in part. Upon information and belief, the Trustee was appointed by the United States Trustee.
4. Denied to the extent the documents filed as Exhibits to the Motion for Relief do not speak for themselves.
5. Denied to the extent the averments of paragraph 5 are other than a statement or conclusion of law or misplaced request for relief. The foreclosure proceedings were stayed by the Court of Common Pleas of Monroe County as of the date of filing.
6. Denied. Upon information and belief, the June 1, 2024, mortgage payment has been paid in full and a portion of the July 1, 2024, mortgage payment has been paid.
7. Denied. See response to paragraph 6, above.

8. Denied. Movant is adequately protected by an equity buffer of approximately \$30,000, the payments made, and future payments. Debtor's wife will rejoin the workforce within the next two years, which should enable regular payments even when Debtor's income decreases due to illness or temporary disability.

9. Denied. Debtor believes the expenditure of attorneys' fee was not reasonable under the circumstances.

10. Denied to the extent the averments of paragraph 10 are other than statements or conclusions of law or misplaced requests for relief.

WHEREFORE, Debtor(s) **MICHAEL JOSEPH PIPITONE** respectfully pray(s) this Honorable Court for an Order that the Motion of **PENNYMAC LOAN SERVICES** for Relief from Stay be Denied, or, in the alternative, that the Stay be conditioned on continuing future payments, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,

/s/ J. Zac Christman
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